

Small Emission Sources

NR 445 Technical Advisory Work Group
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Small Emitters Concept: Objective

- ◆ Focus regulatory efforts on sources with greatest potential environmental/health impacts
- ◆ Retain ability to address sources of concern on a case-by-case basis



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Small Emitters Concept: Rationale

- ◆ High transaction costs for relatively small environmental gain for sources
- ◆ Limited DNR staff resources



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Small Emitters Concept: Outcome

- ◆ Select an “easy” (low transaction cost) way to identify small emitters
- ◆ Draft rule language that would:
 - ◆ Exclude these sources from NR 445 and related regulations (NR 438, NR 406, NR 407)
 - ◆ Allow department to regulate sources on a case-by-case basis, similar to high volume/low toxicity HAPs (TLV's > 99ppm)



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Voluntary Efforts

- ◆ Categories of small emitters would be encouraged to voluntarily reduce emissions of HAP
- ◆ Education & outreach efforts may include:
 - ◆ Small Business Clean Air Assistance Program
 - ◆ Trade Associations
 - ◆ Newsletters
 - ◆ Workshops